

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

EARL C. VOILES, III  
ANTHONY MAXWELL  
GEORGE PUGA  
PHILLIP GALLEGOS

Plaintiff

v.

No. 14-CV-00428-KBM-SCY  
14-CV-00422-SCY-RHS  
14-CV-00440-SCY-KBM  
14-CV-00441-SCY-RHS

STATE OF NEW MEXICO DEPARTMENT OF PUBLIC SAFETY; and  
STATE OF NEW MEXICO LAW ENFORCEMENT ACADEMY; and  
GORDEN E. EDEN, Jr. (Former Cabinet Secretary, Department of Public Safety),  
in his individual and official capacity; and  
PATRICK MOONEY (Deputy Cabinet Secretary, Department of Public Safety),  
in his individual and official capacity; and  
LOUIS MEDINA (Director of New Mexico Law Enforcement Academy),  
in his individual and official capacity; and  
JACK JONES (Deputy Director of New Mexico Law Enforcement Academy),  
in his individual and official capacity; and  
MARK SHEA (Advanced Bureau Chief at New Mexico Law Enforcement Academy),  
in his individual and official capacity; and,  
WILLIAM HUBBARD (Interim Director of New Mexico Law Enforcement Academy).  
Defendants.

**CONSOLIDATED COMPLAINT FOR DAMAGES**

**I. JURISDICTION**

1. COMES NOW Plaintiffs, by and through their attorney, Joseph E. CampBell, and bring this Complaint For Damages and injuries caused by the Defendants' negligent and tortious conduct. This action is brought pursuant to §41-4-1, et seq, NMSA 1978, Notice of Claims; and §10-16C-1 et seq. NMSA 1978, Whistleblower Protection Act; the Constitution of the United State; the New Mexico Constitution; and the laws of the State of New Mexico.